

SEALED

FILED

U.S. DISTRICT COURT
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2014 SEP -3 P 4: 25

UNITED STATES OF AMERICA

UNDER SEAL

v.

CLERK'S OFFICE
AT BALTIMORE

CRIMINAL NO. ROB-14-0411

KEDRICK JENIFER,
TYRONE ALLEN,
BROOKE LUNN,
TRACY MUSE,
THOMAS SIMMONS,
ANDRE BREWER,
MICHAEL WILLIAMS,
KERMIT CLARK, and
WILLIAM HEGIE,

BY _____ DEPUTY *

(Conspiracy to Distribute and
Possess with Intent to Distribute
Cocaine, 21 U.S.C. § 846;
Forfeiture, 21 U.S.C. § 853;
28 U.S.C. § 2461(c); Fed. R. Crim.
P. 32.2(a))

Defendants. *

... oOo ...

MOTION TO SEAL INDICTMENT AND ARREST WARRANTS

The United State of America, by its counsel, Rod J. Rosenstein, United States Attorney for the District of Maryland, and John W. Sippel, Jr., Assistant United State Attorney for said district, respectfully requests an order from the Court sealing the Indictment and Bench Warrants in this case, and in support states the following:

1. On September 3, 2014, the defendants were indicted in a one-count indictment, charging them with conspiracy to distribute and possession with the intent to distribute five kilograms or more of cocaine in violation of 21 U.S.C. § 846. Arrest warrants were obtained as a result of the indictment. In addition, it is anticipated that numerous search and seizure warrants will be obtained and executed at or near the time of the arrests of the defendants.

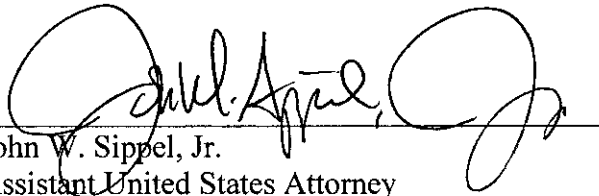
2. Special Agents of the Drug Enforcement Administration are conducting a long-term and ongoing investigation of the defendants and additional targets who may be part of the large-scale cocaine trafficking conspiracy involving the defendants. The investigation remains

ongoing, and if the indictment and arrest warrants are made public, such disclosure may jeopardize the investigation. The indictment and arrest warrants should be sealed until the defendants are arrested to protect the integrity of the investigation; prevent the defendants from becoming aware of their indictments and arrest warrants; and to ensure the safety of the officers/agents, who will be executing search warrants and attempting to arrest the defendants.

3. Notwithstanding this request to seal, the Government respectfully requests that it be permitted to provide copies of the indictment and arrest warrants in this case to law enforcement agents assigned to the investigation and assisting with the arrests of the defendants.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney



John W. Sippel, Jr.
Assistant United States Attorney
36 S. Charles Street
Fourth Floor
Baltimore, Maryland 21201
(410) 209-4807